

**CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.**  
COUNSELLORS AT LAW

CHARLES C. CARELLA  
BRENDAN T. BYRNE  
JAN ALAN BRODY  
JOHN M. AGNELLO  
CHARLES M. CARELLA  
JAMES E. CECCHI

JAMES D. CECCHI (1933-1995)  
JOHN G. GILFILLAN III (1936-2008)  
ELLIOT M. OLSTEIN (1939-2014)

JAMES T. BYERS  
DONALD F. MICELI  
A. RICHARD ROSS  
CARL R. WOODWARD, III  
MELISSA E. FLAX  
DAVID G. GILFILLAN  
G. GLENNON TROUBLEFIELD  
BRIAN H. FENLON  
LINDSEY H. TAYLOR  
CAROLINE F. BARTLETT

**5 BECKER FARM ROAD  
ROSELAND, N.J. 07068-1739  
PHONE (973) 994-1700  
FAX (973) 994-1744  
www.carellabyrne.com**

PETER G. STEWART  
FRANCIS C. HAND  
AVRAM S. EULE  
CHRISTOPHER H. WESTRICK\*  
JAMES A. O'BRIEN III\*\*

OF COUNSEL

\*CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY  
\*\*MEMBER NY AND MA BARS ONLY

RAYMOND J. LILLIE  
WILLIAM SQUIRE  
STEPHEN R. DANEK  
DONALD A. ECKLUND  
MEGAN A. NATALE  
ZACHARY S. BOWER+  
MICHAEL CROSS  
CHRISTOPHER J. BUGGY  
JOHN V. KELLY III  
MICHAEL A. INNES

+MEMBER FL BAR ONLY

April 10, 2019

VIA ECF

Hon. Joseph A. Dickson  
United States Magistrate Judge  
Martin Luther King Federal Building  
50 Walnut Street  
Newark, New Jersey 07102

Re: *In re Mercedes-Benz Emissions Litigation*  
Civil Action No. 16-881 (JLL)(JAD)

Dear Judge Dickson:

This firm, along with Hagens Berman Sobol Shapiro LLP, is interim class counsel and we, along with Seeger Weiss LLP, represent Plaintiffs in the above-referenced matter. We write on behalf of all parties and intervening parties to respectfully request an extension until April 24, 2019, to file a Motion to Seal confidential information in letters regarding the potential appointment of a Special Master in this case, and in the transcript of the hearing held before Your Honor on March 18, 2019.

All interested parties are in the process of meeting and conferring in an attempt to reach agreement on each proposed redaction. The parties have reached agreement on the overwhelming majority of proposed redactions and respectfully request an extension to continue working on the remaining issues that they have not resolved. Until the Court rules on the forthcoming motion to seal, we respectfully request that Dkt. No. 165, 167, 170, 180-82, and the hearing transcript (Dkt. No. 188) be kept under seal. If the parties' requested extension is acceptable to the Court, kindly "So Order" this letter and return a filed copy to all counsel via the Court's CM/ECF system.

Thank you for your continued attention to this matter. Of course, if Your Honor or Your Honor's Chambers have any questions, we are available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ Donald A. Ecklund

DONALD A. ECKLUND

cc: All Counsel (via ECF)